

Summary of the Implementation Committee Meeting October 28, 1997

The Implementation Committee of the National Environmental Laboratory Accreditation Conference (NELAC) convened by teleconference on Tuesday, October 28, 1997, from 11:00 a.m. to 12:00 p.m. Eastern Standard Time. The teleconference was led by its Acting Chair, Ms. Jan Jablonski of the U.S. Environmental Protection Agency. A list of action items is given in Attachment A and a list of participants is given in Attachment B.

Introduction

The purpose of the teleconference was to discuss the agenda topics identified by Ms. Jablonski in her memorandum dated October 16, 1997. Specific agenda items included:

- Update on the NCSL Survey
- NELAC Implementation by EPA Programs
- NELAC Cost Study
- Update on the “dual program” issue.

Ms. Jablonski indicated that the second agenda item (NELAC Implementation by EPA Programs) would not be addressed as Mr. Michael Wilson and Mr. Barry Lesnik of EPA’s Office of Solid Waste and Emergency Response could not be present. She indicated that neither the Superfund and nor the RCRA program offices feel that laboratory accreditation would be beneficial and will not require laboratories to be NELAC accredited on a Federal level. States may do so under their own laws, if they so choose. This topic will require additional discussion on the part of the Implementation Committee.

Ms. Jablonski also indicated that Mr. Norm Low is no longer interested in participating on the Committee. Possible replacements were suggested. The candidates were Mr. Mike Carter of the DOE and Ms. Athene Thacker. Members were requested to contact Dr. Carl Kircher with names of any additional candidates. In the meantime, Dr. Kircher will contact Ms. Thacker and ask her to participate.

Election of Chair

Because Ms. Jablonski had been the acting Chair, a vote was taken to elect a Chair. Dr. Kircher was nominated, the nomination was seconded, and he was elected Chair. Ms. Jablonski stressed that due to an expanded charter, the Implementation Committee must maintain communications with EPA’s EMMC Laboratory; Dr. Kircher indicated his willingness to do so.

Update on the NCSL Survey

The survey has been sent out and responses are being returned to Ms. Barbara Foster at NCSL. Ms. Foster is currently in the process of compiling the results. Some of the respondents definitely support NELAC; some definitely do not. It is not possible to say more at this time. Dr. Irene

Ronning stressed that she needs a copy of the final results so she can fulfill her obligation to send the results to the governors.

NELAC Cost Survey

Ms. Jablonski indicated that she had received some faxes on the NELAC cost analysis. The most recent was from Mr. David MacLean. His fax provided a “back of the envelope” estimate of the cost savings related to personnel time to perform the laboratory assessments. His information is based on numerous assessments and personal experience. Ms. Barbara Hill requested a copy of the estimate so she could provide a reality check from the laboratory perspective.

Ms. Jablonski asked if the cost estimate was compared to the standards. This would provide a good estimate of the impact on industry. Mr. MacLean indicated that the estimate had not been checked against the standards, but based on personal experience, he doubted if it would be off by more than 10 percent.

Some things that need to be considered in the cost estimate are staff time, PT samples, and reporting. Indirect costs can make up two-thirds of the total costs. Some of these items were addressed in the nine-page cost-benefit FAX sent out by Dr. Kircher. However, costs that were not included in that analysis were the time spent reviewing data for out-of-state laboratories for reciprocal certification, plus the increased cost to laboratories for analyzing PT samples. New York’s laboratory accreditation fees could provide an example of accreditation process costs that include PT sample analysis.

The Committee is interested in collecting further information on the cost-benefit analysis and Dr. Kircher expressed an interest in compiling a cost-benefit analysis from a laboratory-operation perspective to be certified according to the NELAC Standards. Ms. Hill indicated she had data from this perspective and would forward it to the Committee for consideration.

Finally, the discussion focused on the differences in cost to small laboratories versus large laboratories. In terms of samples to money, it was stressed that the very small laboratories would need to be addressed in the estimate.

It was suggested that an example quality system document be developed that would be pertinent to municipal water suppliers and wastewater treatment plants. This would consist of a subset of the program for application to these smaller laboratories without relaxing the Standards in which the scope would be made smaller. Specifically, they should look at the results (i.e., fulfillment of NELAC requirements) and not the process for generating the results.

In summation, it was clear that there were good sources of data available and many good ideas as to how best to go about completing the cost estimate. It was suggested that a subcommittee be formed to continue looking at the cost benefit analysis. The subcommittee should work toward getting together something for the Implementation Committee to review.

Update on the “Dual Program” Issue

Ms. Cynthia Dougherty, Director of EPA’s Office of Ground Water and Drinking Water, drafted an internal memo specifying their position on NELAC. The memo indicated that States will be free to run NELAC or current programs. If States meet the NELAC standards that will be sufficient. A committee member suggested that the language should be stronger: the memo should specify that NELAC is senior to the drinking water requirements, or at the very least, it should say that the programs are “equally acceptable.” Since, the memo is an EPA internal document no input from the Implementation Committee will be considered.

Because the memo represents an important policy statement on the part of EPA, Committee members requested the opportunity to review the document. Ms. Jablonski expects that Ms. Jeannie Mourrain to make it available to NELAC members.

It was also suggested that there should be wording added to the CFR making NELAC equivalent to State programs. Such an act on the part of EPA would help States in their implementation of NELAC. However, EPA does not intend to make any regulatory changes regarding NELAC.

There was also discussion on how the NELAC tiers of accreditation relate to existing categories of certification or fields of testing in various states. Although no conclusions were reached on this issue, the potential impact on reciprocal certification determinations warrants further discussion in future meetings.

New Business

Dr. Kircher suggested that a spreadsheet be developed that contains issues and current status to help focus the committee and move toward accomplishing goals. Considering the amount of work that would be need to develop such a spreadsheet, the benefit of such an endeavor was questioned. A final decision was not made.

**Action Items
Implementation Committee Teleconference
October 28, 1997**

Item No.	Action	Date Completed
1.	Additional discussion with the Superfund and RCRA program offices is needed. This topic is to be included on future teleconference agendas.	
2.	Dr. Kircher will to contact Ms. Thacker and inquire as to her interest in serving on the Implementation Committee ¹ .	10/28/97
3.	If Committee members think of additional candidates, they are asked to contact Dr. Kircher.	
4.	A subcommittee is to be formed to continue looking at the cost benefit analysis for the review of this Committee.	
5.	A copy of the completed NCSL survey results is to be send to Dr. Ronning	

¹ *Follow up:* Athene Thacker has already been appointed to the On-Site Assessment Committee, and thus, is not eligible for this Committee at present.

**Participants
Implementation Committee Teleconference
October 28, 1997**

Name	Affiliation	Telephone/Fax Number
Jan Jablonski	U.S. Environmental Protection Agency	T: 202/260-8306 F: 202/401-2915 E: jablonski.janice@epamail.epa.gov
Carl Kircher, Chair	Florida HRS Office of Lab Services	T: (904) 791-1574 F: (904) 791-1591 E: ckircher@dcf.state.fl.us
Wanda Carter (Invited)		T: F: E:
Barbara Hill (Invited)	WMX Technologies	T: 630/208-3112 F: 630/208-1175 E: barbara_hill@wmx.com
Wanda Ingersoll	Mississippi Public Health Lab	T: (601) 960-7582 F: (601) 354-6124 E: N/A
David MacLean		T: (703) 451-1578 F: (703) 451-1578 E: aquilla41@aol.com
George Mills (Invited)	Vermont Department of Health Laboratories	T: 802/863-7612 F: 802/863-7632 E: gmills@vdhvax.vdh.state.vt.us
Harry Otto	State of Delaware — DNREC	T: (302) 739-5726 F: (302) 739-3491 E: hotto@dnrec.state.de.us
Irene Ronning (Invited)	Oregon Health Division/Public Health Laboratories	T: 503/229-5505 F: 503/229-5682 E: irene.e.ronning@state.or.us
Don Zahniser	Eastman Kodak, Environmental Analytical Services	T: (716) 722-3331 F: (716) 477-8468 E: N/A
Mary Siedlecki (support contractor)	Research Triangle Institute	T: (919) 541-6307 F: (919) 541-8830 E: mts@rti.org